

164559



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

NOV 21 1989

Mr. Charles J. Kulp
U.S. Fish and Wildlife Service
Suite 322
315 South Allen Street
State College, PA 16801

Re: NVF Site; Kennett Square, Chester County, Pennsylvania.

Dear Mr. Kulp:

I apologize for the delay in responding to your September 1, 1989 letter regarding the PCB contamination in the West Branch of the Red Clay Creek (WBRCC) and tributaries downstream of NVF's Kennett Square facility.

Your letter raised several issues concerning the appropriateness of the cleanup standards required by EPA at the NVF Site. Your concern about a 50 ppm cleanup level would normally be justified, however, our March 31, 1988 Administrative Order required a 50 ppm "action level" not cleanup level. For areas that exceeded that action level, the cleanup level required was 10 ppm. This type of action level/cleanup level approach was used as an initial starting point for actions that required an immediate action to protect human health.

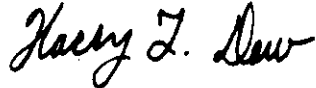
However, we do recognize the inconsistency of requiring a 10 ppm cleanup level in some areas while in other areas, levels of 10-50 ppm remain. Therefore, we are reevaluating the available analytical data to determine the environmental vs. human health threat posed by the current levels and will determine if a more stringent cleanup level is appropriate for a CERCLA Removal action.

Upon completion of this evaluation we will determine whether more stringent cleanup levels can be required under the existing Order or if additional enforcement action is warranted. During this process, we will be in consultation with your office to

AR100838

develop an environmentally sound cleanup strategy in the unnamed tributary of the WBRCC. Additionally we will continue our efforts to evaluate the Site for inclusion on the NPL. Please feel free to call me at (215) 597-6687 if you have any questions.

Sincerely,



Harry T. Daw, EPM
Enforcement and Title III Section

cc: Dennis Carney, 3HW30
Cynthia Rice, USF&WS
Robert Kramer, 3ES10

AR100839